

1 When writing these definitions, the Commission specifically considered and  
2 rejected requests that it not include DSLAMs as part of the packet switching UNE  
3 — “We decline to adopt proposed definitions of packet switching that exclude  
4 DSLAMs from the packet switching functionality.”<sup>26</sup>

5  
6 There can be do doubt that DSLAMs provide packet switching functionality. As  
7 the Commission found, “packetizing is an integral function of the DSLAM.”<sup>27</sup>

8 **Q. IS THERE ANY BASIS IN THE COMMISSION’S RULES FOR AT&T’S**  
9 **ATTEMPTS TO INCLUDE OCDS IN THE DEFINITION OF A LOOP?**

10 A. No. The OCD is an ATM switching device that performs routing and aggregation  
11 of packet data. The Commission has found that the OCD “should be classified as  
12 Advanced Services Equipment” as a packet switch.<sup>28</sup> In fact, in the same order,  
13 the Commission rejected “AT&T’s argument that the OCD should not be  
14 classified as Advanced Services Equipment.”<sup>29</sup>

15  
16 AT&T seeks to analogize OCD to the COTs that are used for circuit switched  
17 traffic, but this attempt fails because OCDs and COTs have different features and  
18 functions and are not comparable. The COT is the device in the central office that  
19 terminates the feeder transport from the remote terminal and either converts  
20 narrowband traffic back to analog or directs integrated voice traffic to the digital

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<sup>26</sup> *UNE Remand Order* ¶ 304.

<sup>27</sup> *UNE Remand Order* ¶ 304.

<sup>28</sup> *Ameritech Corp.*, 15 FCC Rcd 17521 ¶ 18 (2000) (“*Project Pronto Order*”).

1 switch.<sup>30</sup> Thus, the COT takes traffic already allocated to specific “dedicated”  
2 time slots and simply directs it to the appropriate voice switch line unit or digital  
3 device in the central office. The COT does not aggregate or switch traffic  
4 between switch interface groups.

5  
6 Unlike a COT, an OCD is a packet switch. The OCD must read ATM header  
7 information, route individual packets to the appropriate outgoing port and  
8 aggregate them into a high-speed ATM carrier interface. In addition, the OCD  
9 must be capable of routing ATM traffic based on different ATM classes of  
10 services. Consequently, the OCD must have the sophistication to police incoming  
11 traffic and verify that it meets the traffic contract requirements on a virtual circuit-  
12 by-virtual circuit basis. It clearly performs a different function than a COT, and  
13 specifically performs packet switching functions.

14 **Q. DO CURRENT COMMISSION REGULATIONS SPECIFY WHEN**  
15 **DSLAM/PACKET SWITCHING FUNCTIONALITY MUST BE**  
16 **PROVIDED AS A UNE?**

17 A. Yes, as discussed above, four conditions must be satisfied for packet switching to  
18 be considered a UNE, and they have not been satisfied. Accordingly, the  
19 Commission requirements for packet switching/DSLAM functionality to be  
20 deemed a UNE are not met.

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29 *Project Pronto Order ¶ 19.*

30 The COT may also direct non-switched traffic (commonly called special services) to interoffice transport or other digital network elements in the central office.

1           **Q.     IN THE JOINT DISPUTED POINTS LIST (ISSUE V6), AT&T CLAIMS**  
2                   **THAT THE PROPOSED VERIZON INTERCONNECTION AGREEMENT**  
3                   **ONLY PROVIDES FOR ACCESS TO THE HFPL AT THE CENTRAL**  
4                   **OFFICE. IS THIS ACCURATE?**

5           A.     No. As stated immediately above, Verizon VA's proposed language allows  
6                   interconnection of a CLEC provided DSLAM at sub-loop interconnection points.

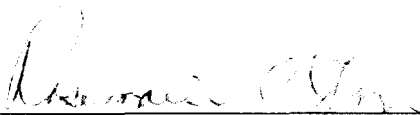
7           **Q.     DOES THIS CONCLUDE THE PANEL'S TESTIMONY?**

8           A.     Yes, it does.  
9

### **Declaration of Rosemarie Clayton**

I declare under penalty of perjury that I have reviewed the foregoing panel testimony and that those sections as to which I testified are true and correct.

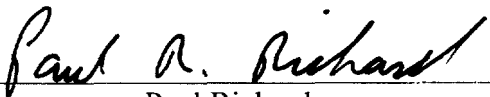
Executed this 27 day of July, 2001.

  
\_\_\_\_\_  
Rosemarie Clayton

### **Declaration of Paul Richard**

I declare under penalty of perjury that I have reviewed the foregoing panel testimony and that those sections as to which I testified are true and correct.

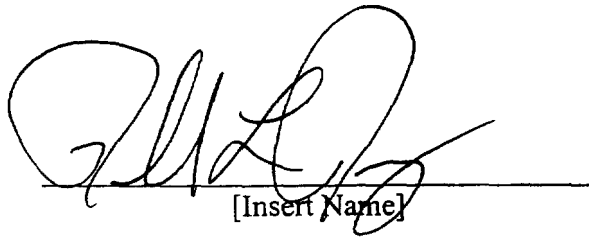
Executed this 27<sup>th</sup> day of July, 2001.

  
\_\_\_\_\_  
Paul Richard

**Declaration of Richard L. Rousey**

I declare under penalty of perjury that I have reviewed the foregoing panel testimony and that those sections as to which I testified are true and correct.

Executed this 27 day of July, 2001.

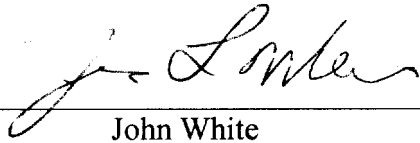


[Insert Name]

**Declaration of John White**

I declare under penalty of perjury that I have reviewed the foregoing panel testimony and that those sections as to which I testified are true and correct.

Executed this 30 day of July, 2001.

A handwritten signature in cursive script, appearing to read "John White", is written over a horizontal line.

John White





**CURRICULA VITAE FOR ADVANCED SERVICES PANELISTS**

**I. ROSE CLAYTON**

Ms. Clayton received her Business Administration education from the University of Richmond. She has been employed with Verizon Services Corporation (formerly Bell Atlantic) since 1979. She spent her first five years with Bell Atlantic in the Commercial Business Unit handling complex services such as Wide Area Telephone Service, Hi-Capacity Services and claims for large commercial customers. After that time, Ms. Clayton held various management positions of increasing responsibility in the Staff Department writing Methods and Procedures for business and residential Service Centers, working with customer measurements and developing change management controls and processes.

In 1987 Ms. Clayton accepted a position with Bell Atlantic's Carrier Access Services Department. In this position she was responsible for Billing Output Specifications, deviations as they related to National Standards and also acted as liaison between carriers, end users, marketing staffs and Bell Atlantic's Information Systems programmers on ordering and provisioning and requirements. In 1996, Ms. Clayton was assigned to the Interconnection and Unbundled Services Department (now, Wholesale Markets) and was responsible for the development and implementation of Unbundled Network Elements, specifically the development of unbundled loops and unbundled switching, in accordance with the requirements and obligations of the Telecommunications Act of 1996. In 1998, Ms. Clayton was promoted to Senior Specialist, and was dedicated to the effort within the fourteen Bell Atlantic states (a combined Bell Atlantic/Nynex Company) of developing and implementing xDSL capable unbundled loops. In this capacity Ms. Clayton was responsible for business policy formulation, product development, pricing arrangements, loop qualifications and conditioning for xDSL loops. Her responsibilities also included active participation in the New York Commission's

xDSL/Line Sharing/Line Splitting Collaboratives and eventually, becoming Product Manager for Line Sharing in addition to the xDSLs. In her current Senior Specialist position with Verizon, Ms. Clayton continues to manage the xDSL unbundled loop offerings, loop conditioning, and Line Sharing for the entire Verizon territory.

## **II. PAUL RICHARD**

Mr. Richard earned a Bachelor's degree in Mathematics and Economics from Colgate University and a Masters in Business Administration in Finance from New York University's Stern School of Business. Prior to his present position with Verizon Services Corporation, Mr. Richard developed interexchange carrier access products, including SS7 signaling, 45 MBPS multiplexing and SONET transport. In addition to his Marketing experience, Mr. Richard has held various assignments in Network Planning and Federal Regulatory during his 22 years with New York Telephone, NYNEX, Bell Atlantic and Verizon.

## **III. RICH ROUSEY**

Mr. Rousey is currently working towards an Associate's degree at North Lake Community College located in Irving, Texas. Mr. Rousey has over 25 years of experience with the former GTE and Verizon Services Corporation. He has been developing CLEC-oriented products in Wholesale Service Marketing since 1996, and helped introduce such products as Interim Number Portability, Local Number Portability, Unbundled Loops, Unbundled Sub-Loops, Line Sharing, Enhanced Extended Links, Unbundled Network Interface Devices and Remote Terminal Collocation. Prior to his present position, Mr. Rousey held various positions with increasing responsibility within the Wholesale Organization as well as both the Consumer and Business Organizations.

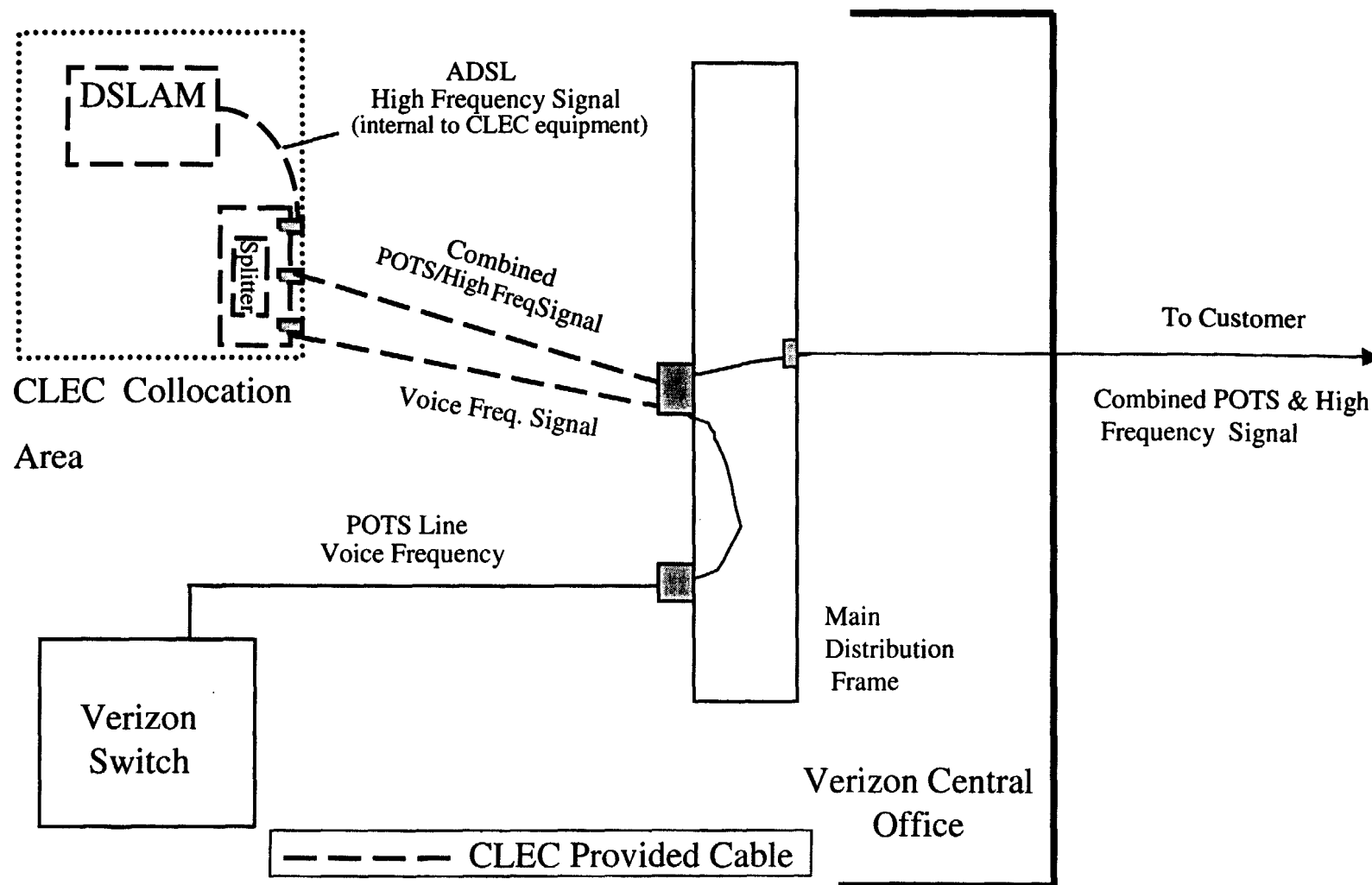
**IV. JOHN WHITE**

Mr. White began his engineering studies at the University of Buffalo, and received a Bachelors in Business Administration, and a Masters in Business Administration from Pace University, where he have also continued graduate work in Finance and Economics as part of a DPS program. Before joining Verizon Services Corporation's wholesale organization in June 1999, Mr. White worked in the Bell Atlantic Technology organization as the Executive Director, Transport Technology Planning. Mr. White has been employed by Verizon or by its affiliates and predecessor companies since 1966. During the first twelve years of his career, Mr. White was directly involved in virtually every aspects of outside plant engineering. He then went on to managerial positions in Construction, Installation and Maintenance, as well as Engineering in both line and staff capacities.



## Verizon Line Sharing

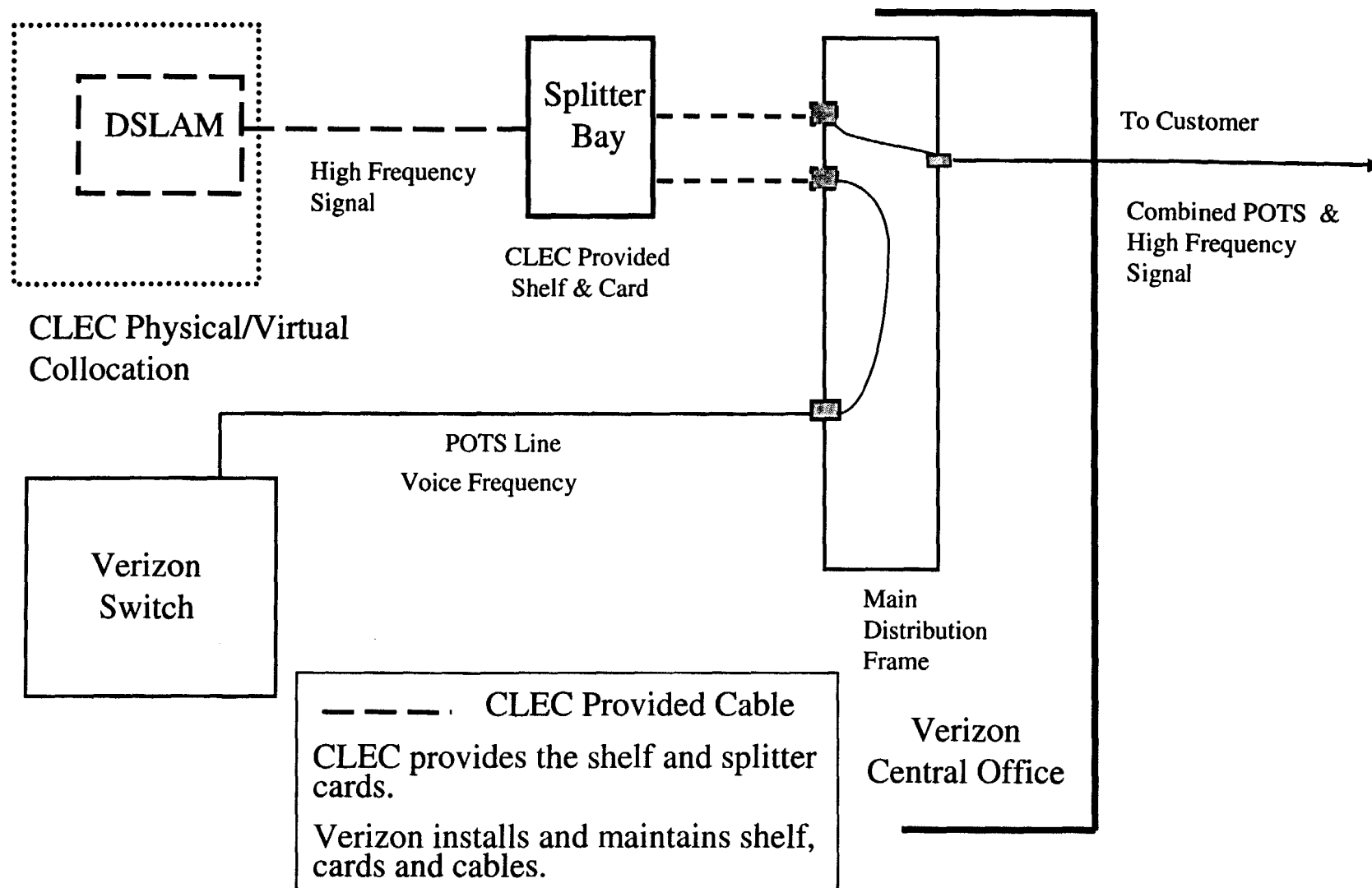
### Physical Collocation - CLEC Owned Splitter





## Verizon Line Sharing

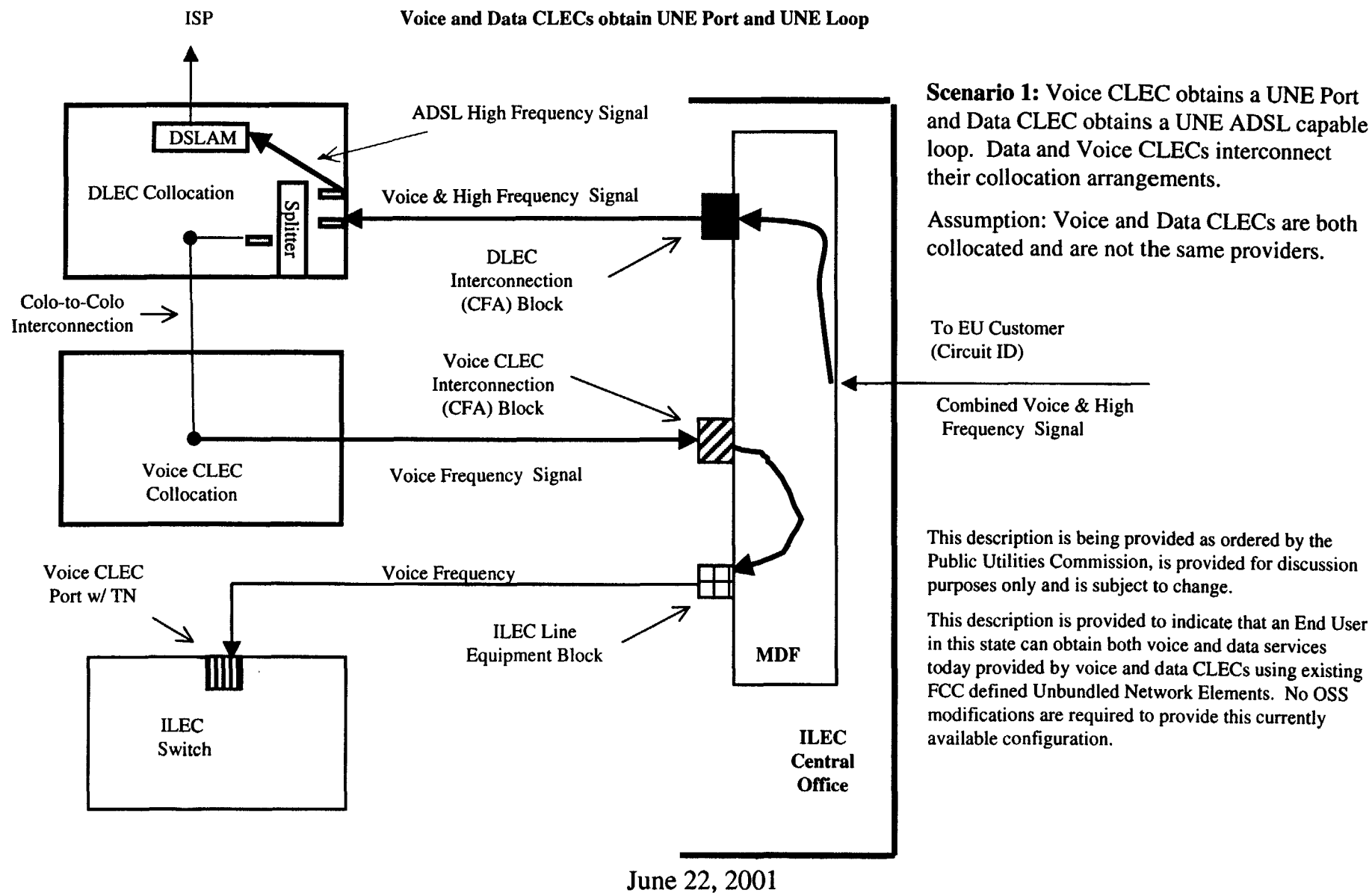
### Virtual - CLEC Owned Splitter







## Line Splitting on All Copper Loops Currently Available Today To All Voice and Data CLECs

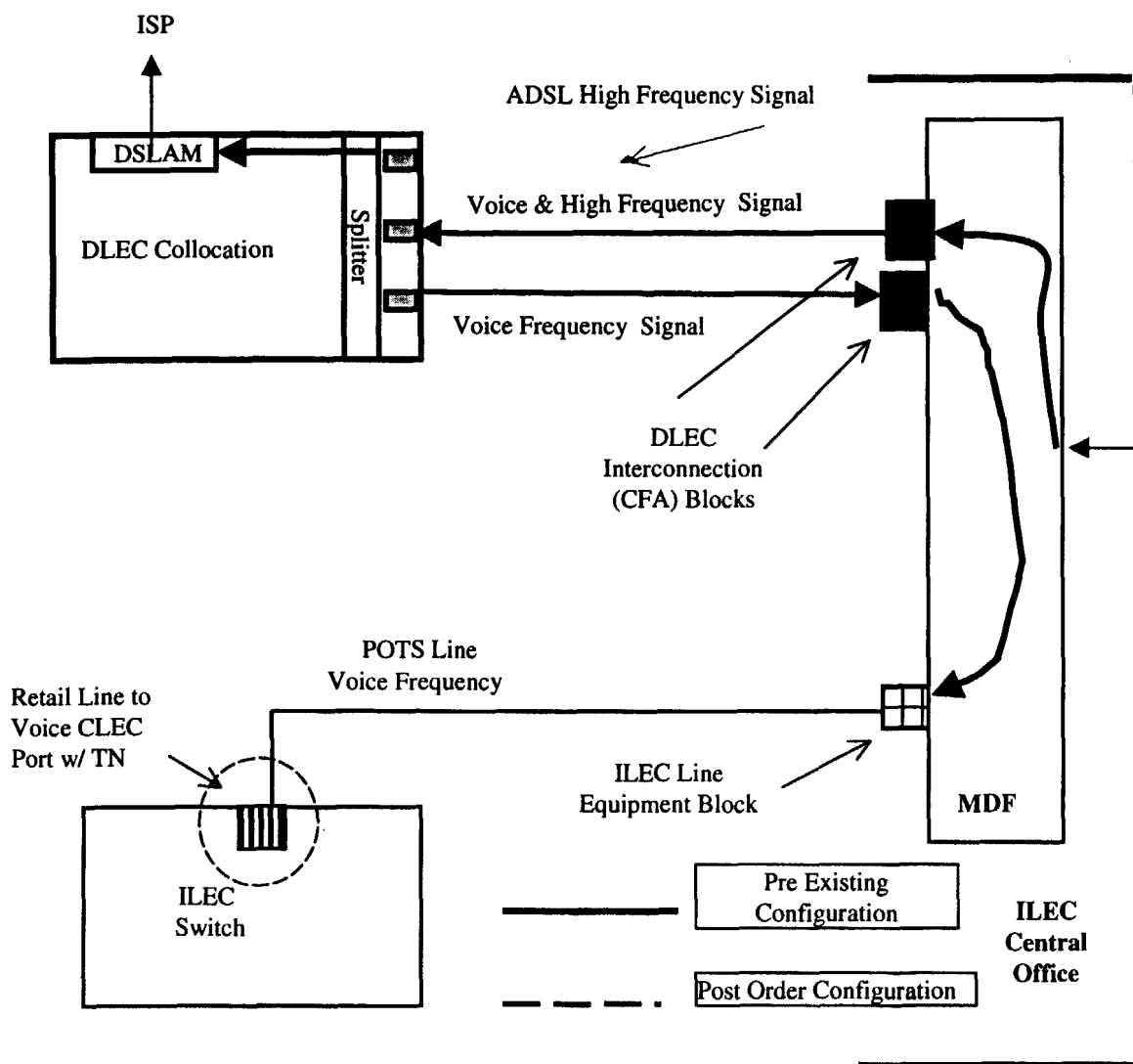




# Line Splitting on All Copper Loops Future View

DLEC Line Sharing Converts to Voice CLEC w/ DLEC Data

Verizon Virginia Inc.  
CC Docket Nos. 00-218, 00-249,  
00-251  
Exhibit ASP-5



**Scenario 2: DLEC Line Sharing with ILEC,**  
EU converts to a Voice CLEC and retains  
DLEC Data (Line Splitting).

Assumptions: Line sharing pre-exists prior to  
line splitting being requested.

Voice and Data CLECs could be the same  
provider or different for line splitting  
arrangement.

To EU Customer (Circuit ID)

Combined Voice & High  
Frequency Signal

This description is being provided as ordered by the  
Public Utilities Commission, is provided for discussion  
purposes only and is subject to change.

This arrangement does not exist today nor is this  
description an offer to develop such an arrangement. It  
is merely a possible configuration of how line splitting  
could be arranged if Line Sharing currently exists on an  
end user's analog copper loop. No systems work has  
been developed to make this type of arrangement  
available.

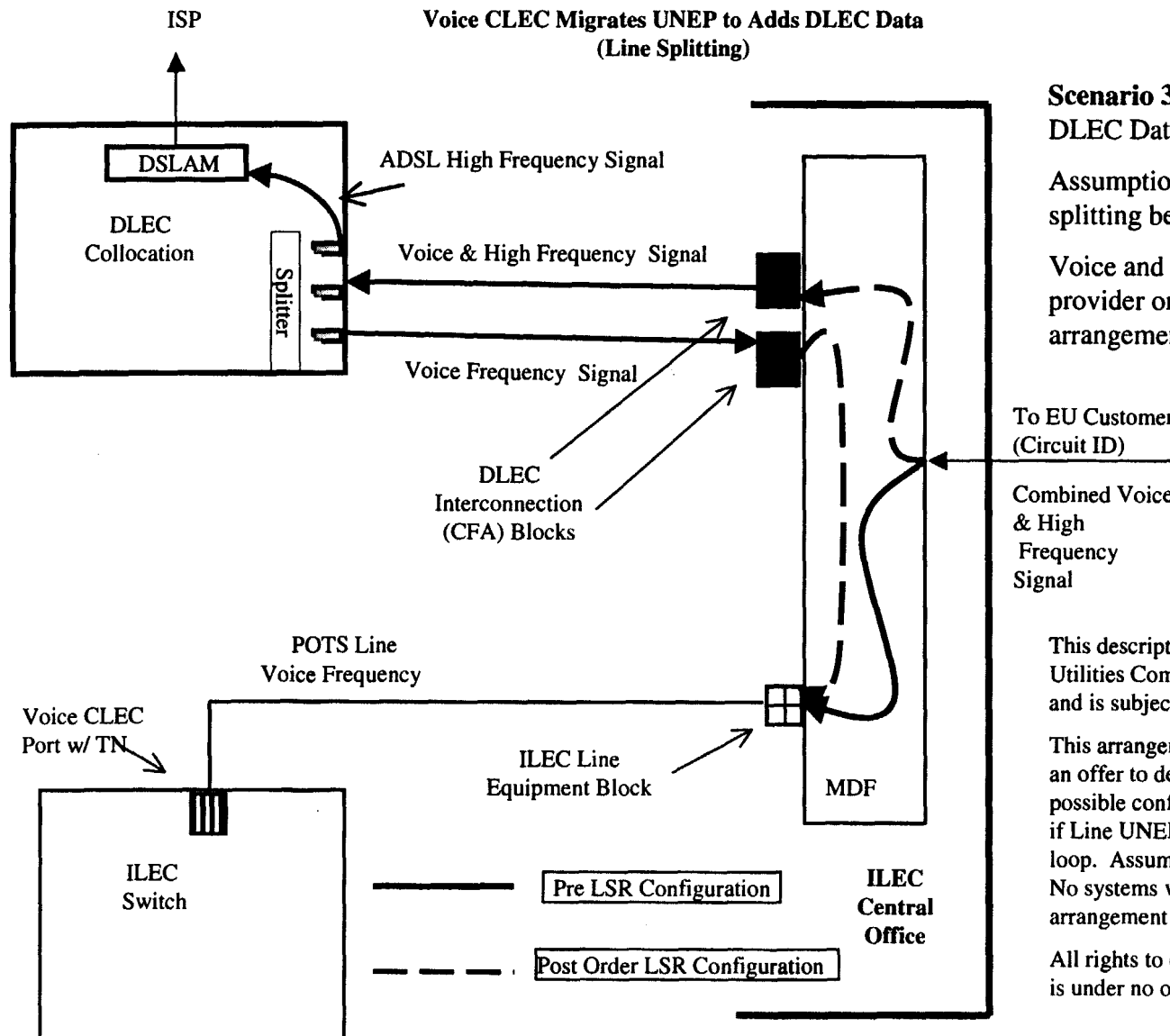
All rights to object to this arrangement are reserved.

June 22, 2001



# Line Splitting on All Copper Loops Future View

Verizon Virginia Inc.  
CC Docket Nos. 00-218, 00-  
249, 00-251  
Exhibit ASP-6



**Scenario 3:** Voice CLEC UNEP account adds DLEC Data (Line Splitting).

Assumptions: UNEP pre-exists prior to line splitting being requested.

Voice and Data CLECs could be the same provider or different for line splitting arrangement.

This description is being provided as ordered by the Public Utilities Commission, is provided for discussion purposes only and is subject to change.

This arrangement does not exist today nor is this description an offer to develop such an arrangement. It is merely a possible configuration of how line splitting could be arranged if Line UNEP currently exists on an end user's analog copper loop. Assumes that the loop is qualified for data capability. No systems work has been developed to make this type of arrangement available.

All rights to object to this arrangement are retained. Verizon is under no obligation to provide new combinations.

June 22, 2001



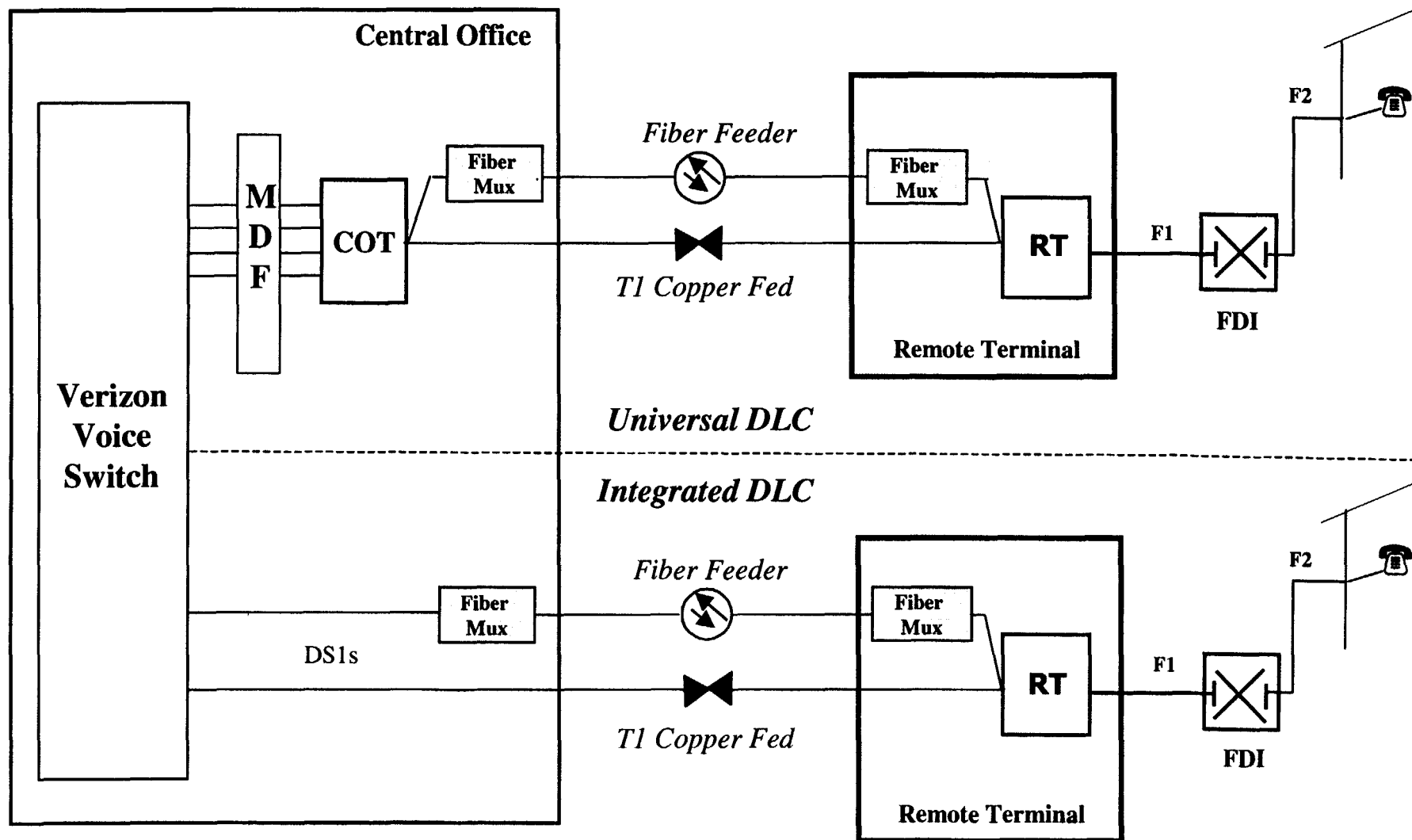


# Generic Digital Loop Carrier Design

Verizon Virginia Inc.

CC Docket Nos. 00-218,  
00-249, 00-251

Exhibit ASP-7









## Typical Remote Terminal Architecture

Verizon Virginia Inc.  
CC Docket Nos. 00-218, 00-  
249, 00-251

Exhibit ASP-8

